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CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK ANTHONY SIEVERT,

Defendant.

)  
)  
) Criminal No. 3: 12-cr-104  
)  
)

**INDICTMENT**

) T. 18 U.S.C. §§2251(a), 2251(e)  
) T. 18 U.S.C. §2422(b)  
) T. 18 U.S.C. §2252(a)(2)  
) T. 18 U.S.C. §2252(a)(4)(b)  
)  
)  
)

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Attempted Enticement of a Minor)**

During the period beginning on or about July 8, 2012, and continuing to on or about July 16, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did use facilities of interstate and foreign commerce, that is, cellular telephones, to attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, a 15-year old girl, to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**  
**(Attempted Production of Child Pornography)**

During the period beginning on or about July 17, 2012, and continuing to on or about July 19, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce and entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**  
**(Attempted Enticement of a Minor)**

On or about July 17, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did use facilities of interstate and foreign commerce, that is, cellular telephones, to attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, a 15-year old girl, to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 4**

**(Attempted Production of Child Pornography)**

On or about July 22, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce and entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said minor for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 5**

**(Attempted Enticement of a Minor)**

On or about July 24, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did use facilities of interstate and foreign commerce, that is, cellular telephones, to attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, a 15-year old girl, to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 6**

**(Attempted Production of Child Pornography)**

During the period beginning on or about July 27, 2012, and continuing to on or about July 28, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce or entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals or pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 7**

**(Attempted Production of Child Pornography)**

On or about August 4, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce or entice a person under the age of eighteen, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 8  
(Attempted Enticement of a Minor)**

During the period beginning on or about August 13, 2012, and continuing to on or about August 15, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did use facilities of interstate and foreign commerce, that is, cellular telephones, to attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, a 15-year old girl, to engage in sexual activities for which a person could be charged with a criminal offense.

This is a violation of Title 18, United States Code, Section 2422(b).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 9  
(Attempted Production of Child Pornography)**

On or about August 14, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce and entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 10**  
**(Attempted Production of Child Pornography)**

On or about August 15, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce and entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 11**  
**(Attempted Production of Child Pornography)**

On or about August 25, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did attempt to persuade, induce and entice a person under the age of 18, that is, a female 15 years of age, to engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals or pubic area of said minor, for the purpose of producing a visual depiction of such conduct, specifically an image produced by a camera on a cellular telephone, with knowledge that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 12**  
**(Possession of Child Pornography)**

On or about November 19, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did knowingly possess one (1) and more items, including images stored on cellular telephones and other matters, containing visual depictions that had been shipped and transported in interstate and foreign commerce, and which were produced using materials which had been so shipped and transported, by any means including by a computer, the producing of said visual depictions involving the use of minors, that is, persons under the age of 18 years, engaging in sexually explicit conduct as defined in Title 18, United States Code, §2256(2), including, but not limited to, the lascivious exhibition of the genitals and the pubic area of any person, said visual depictions being of such conduct.

This is a violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 13**  
**(Receipt of Child Pornography)**

On or between July 8, 2012, and September 14, 2012, in the Southern District of Iowa, the defendant, MARK ANTHONY SIEVERT, did knowingly receive visual depictions that had been shipped and transported in interstate and foreign commerce by any means, including by computer, the producing of said visual depictions involving the use of a minor, that is, a person

under the age of 18 (18) years, engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), said visual depictions being of such conduct.

This is a violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**A TRUE BILL.**

/s/

FOREPERSON

Nicholas A. Klinefeldt  
United States Attorney

By: /s/

Clifford R. Cronk III  
Assistant United States Attorney